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CCL Custom Manufacturing, Inc.

Martin Street
Cumberland, RI 02864

September 3, 2002

Mr. Juan Thomas
Project Manager
U.S. Environmental Protection Agency
Region V - 8th Floor - DRE-8J
77 West Jackson Boulevard
Chicago, IL 60604-3590

Re: CCL Custom Manufacturing, Inc.
June, July and August, 2002
Ninth Quarterly Report
V-W-88-C-136/ILD 005 141 726

Dear Mr. Thomas:

In accordance with U.S. EPA's agreement of June 14, 2000 to modify the reporting frequency from monthly to quarterly, this Ninth Quarterly Report is submitted on behalf of CCL Custom Manufacturing, Inc. This Quarterly Report is submitted in accordance with Section VII of the Administrative Order on Consent as modified by that June written agreement of the parties. This Quarterly Report covers the months of June, July and August 2002.

1. **Actions, which have been taken to achieve compliance** - CCL has continued to effectively operate and maintain both the Perimeter Ground-Water Interceptor and the TTUA Interceptor during the months of June, July and August 2002. As part of its maintenance of the TTUA Interceptor, CCL performed some cleaning measures to improve flow of collected groundwater through and from the collection piping in the TTUA Interceptor trench during July and August. These measures appear to have been successful in improving these flows.

In accordance with its permit from IEPA, CCL continues to operate an aeration system on the discharge from the Perimeter Ground Water Interceptor to control volatile compound concentrations in its discharge to the local publicly owned treatment plant. Testing has shown that the aeration is effective in controlling volatile levels in that discharge. An air stripper unit treats the TTUA interceptor effluent prior to its discharge to a publicly owned treatment plant. CCL has maintained compliance with its discharge permits for both the Perimeter and TTUA Interceptors through this reporting period.

2. **Results of sampling and other data received by CCL** - CCL did not do, nor was it required to do, any additional sampling pursuant to the Administrative Order on Consent during this quarterly period. Quarterly ground water monitoring is conducted as part of the post-closure care at the facility as required by the IEPA. As part of the routine quarterly monitoring, water levels are measured both up and downgradient of the Perimeter Ground Water Interceptor to demonstrate its continuing effectiveness. The results of the quarterly

ground water monitoring are provided to EPA under separate cover. CCL also monitors the water quality and flows from the two interceptors for its IEPA and POTW permits. A compilation of that information was provided to EPA in January 2001 in the revised Corrective Measures Study. If EPA would like that data updated, CCL would be willing to provide such information upon Agency request.


3. **Tasks and actions completed in June, July August, 2002 and scheduled for the next quarter** - CCL has completed its revised RFI Report and its Corrective Measures Study Report (CMS). The Revised RFI Report has been approved by U.S.EPA; the updated CMS is currently under review by the Agency. Comments on that Report were received during this reporting period and responses were provided on a timely basis. CCL has also requested a meeting with the EPA to resolve any out-standing CMS questions. It is CCL's expectation that the meeting will be set for later in September or early October 2002 as requested by U.S. EPA.

The original of the CMS was submitted to U.S. EPA approximately two and a half years ago. A revised CMS was provided to the Agency on CCL's own initiative on March 16, 2001. CCL and EPA met on August 23, 2001 to discuss Site background and how to expeditiously proceed to final resolution of this RFI/CMS project. In addition CCL and EPA met in Danville on October 24th to tour the facility and discuss the completion of the CMS process. The parties again agreed that every effort would be made to resolve this matter expeditiously.

4. **Elements not completed** - CCL did not fail to complete any required site activities during this quarter.

If you have any questions concerning this quarterly report, please feel free to contact us. We look forward to meeting with the Agency to address any remaining questions on the CMS so that this Report can be finalized for approval.

Very truly,


Richard Ferreira *Mod*

RF: gfm

cc: Jim Tracy
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